

EXHIBIT 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

ROBERTA AGYEMAN, JOSEPH
AMEYAW, EDWARD AHERN, JUNE
AHERN, ABDUL MOSOBBIR,
LAFAYETTE FREDERICK, DENISE
ALLEN, ROBERT ALONSO, GIOVANNI
JAVIER, FILIBERTA BARRAGAN, DEBRA
AMATUCCIO, RYAN AMUNDSON,
ORLAND AMUNDSON, KAREN
AMUNDSON, HELOUIZA ASARO, ROBIN
AUDIFFRED, SAMANTHA AYALA,
EVELYN PETTIGNANO, SADIE REOCH,
KAREN REOCH- MORIARTY, LAURA
BAIERWALTER, SUSAN BARNES-FORD,
RICARDO BARNES, ELIZABETH LINKER,
WILLIAMJ. BIGGART, MARGARET
BIGGART, WILLIAM BISHOP, KEVIN
SMITH, KIM WILLIAMS, CAROL
BOCCARDI, MICHAEL BOCCARDI,
EUGENE BOWEN, CARRIE TILLMAN,
MICHELEL. HORNBACK, JEFFERYM.
BRIGHT, MARIA CABALLERO, JOSEPH
CACHIA, FRANCINE CALABRO,
ALEXANDER CALABRO, DANIEL
CALABRO, CARL CALABRO,
MARGUERITE CALIXTE-WILLIAMS,
VINCENT CAMAJ, CRYSTAL ORTIZ,
EVITA ORTIZ, DEBRA CARSON,
ANGENETTE CASH, FREDDYE CARTER-
PERRY, PAUL CASALDUC, EVAN
CASCIO, PAUL CASCIO, JANET CASCIO,
CLAUDIA RODRIGUEZ, YOLANDA
CASTANO, FRANCISCO CASTANO,
STEVEN CASTANO, SILVIO ROMAN,
VIRGINA CHADA, SELENA CHERRY-
DANIEL, ANA SORIA, LUIS CHIMBO,
FAHINA CHOWDHURY, FARQAD
CHOWDHURY, BARAHEEN ASHRAFI,
WILLIAM CINTRON-LUGOS, LASHAWN

Civil Docket Number: _____

**SHORT FORM COMPLAINT AND
DEMAND FOR TRIAL BY JURY**

ECF CASE

CLARK, STEPHANIE MARIE CLARKE
SAMPSON, MIO CLOUD, BETH
NATIELLO- SCHOTTE, JOYCE COHEN-
DAY, ORQUIDIA COLON, ROSA COLON,
REGINALD COLON, JUANA COLON-
CONCEPCION, JAMIE CONCEPCION,
DOROTHY M. TAYLOR, RUSSELL
CONWAY, KEIDY GARCIA, TEOFLIA
GARCIA, BLANCA M. GARCIA, EDSON
GARCIA, MOISES CORDERO, LAURA
BUCK, JOHN COSTANZA, JAMES COYLE,
CHARLES CROSS, VIRGINIA
FREDRIKSEN, CAROL CUBAS, ERIKA
SULFIKA, HELGA CURTIN, DANIEL
DAVIDSON, WILLIAM DAVIDSON,
PAIGE DEBEK, ROBERT MOORE,
MAUREEN MOORE, LISA REAHL, DAVID
DECONTO,

PLAINTIFFS,

v.

ISLAMIC REPUBLIC OF IRAN,

DEFENDANT.

IRAN SHORT FORM COMPLAINT

Plaintiffs file this Short Form Complaint against Defendant Islamic Republic of Iran (“Iran”) arising out of the September 11, 2001 terrorist attacks (“September 11, 2001 Terrorist Attacks”) as named herein by and through the undersigned counsel.

Plaintiffs incorporate by reference the specific allegations, as indicated below, of the *Burnett, et al. v. Islamic Republic of Iran et al.*, Amended Complaint, 15-cv-9903 (S.D.N.Y.) (GBD) (SN) Doc. No. 53 (hereinafter the “*Burnett Iran Complaint*”).

Plaintiffs file this *Iran Short Form Complaint* as permitted and approved by the Court’s Order of May 25, 2018, 2018, ECF No. 4010 in 1:03-md-01570-GBD-SN.

Upon filing of this *Iran Short Form Complaint*, Plaintiffs are deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, Plaintiffs incorporate the factual allegations and findings contained in those pleadings and orders filed, *inter alia*, at *Havlish v. Bin Laden*, Docket No. 1:03-cv-9848, ECF Nos. 263, 294, 295 (S.D.N.Y. Dec. 22, 2011); *Havlish v. Bin Laden*, 03 MDL 1570, ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before Hon. George B. Daniels on December 15, 2011 (ECF No. 2540).

This *Iran Short Form Complaint* relates solely to Defendant Iran, and does not apply to any other defendant.

VENUE

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

JURISDICTION

2. Jurisdiction against Iran is premised on the grounds set forth in the complaints specified below, including but not limited to 28 U.S.C. § 1605(a) (tort exception to the Foreign Sovereign Immunities Act), 28 U.S.C. § 1605A (terrorism exception to the Foreign Sovereign Immunities Act) and 28 U.S.C. § 1605B (Justice Against Sponsors of Terrorism Act).

CAUSES OF ACTION

3. Plaintiffs hereby adopt and incorporate by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☐ *Ashton* Iran Complaint, Docket Number 02-cv-6977 (S.D.N.Y.) (GBD)(SN) (03-md-1570 ECF Doc. No. 3237)
- ☒ *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53)

4. In addition, Plaintiffs hereby assert the following additional causes of action:

- ☒ *Iran Short Form Complaint* First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiffs allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the *Havlish* filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

- ☐ *Iran Short Form Complaint* First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiffs allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the *Havlish* filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

5. Plaintiffs are making such claim on the following basis, and incorporates by reference that supplemental information provided on Appendix 1 to the *Iran Short Form Complaint*, identifying the Plaintiffs asserted basis for participating in this suit:

- X Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- X Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF PLAINTIFFS

6. The following allegations and information are alleged on behalf of each individual who is bringing this claim, as indicated on Appendix 1 to this *Iran Short Form Complaint*, herein referred to as "Plaintiffs."

- a. The citizenship/nationality of each Plaintiff is indicated at Appendix 1 to this *Iran Short Form Complaint*.
- b. Plaintiff is entitled to recover damages on the causes of action set forth in the complaint identified above, as joined by this *Iran Short Form Complaint*, and as further asserted within this *Iran Short Form Complaint*.

- c. As indicated at Appendix 1, Plaintiff (i) is the estate representative of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; (ii) is the surviving immediate family member of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; and/or (iii) suffered physical injuries as a result of the September 11, 2001 Terrorist Attacks.
- d. For those plaintiffs with personal injury claims, as indicated in Appendix 1, related to the September 11, 2001 Terrorist Attacks, said Plaintiff was present at the Pentagon and/or the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged, as stated specifically in Appendix 1.
- e. For those plaintiffs with personal injury and/or wrongful death claims, as indicated in Appendix 1, as a direct, proximate and foreseeable result of Defendant's actions or inactions, Plaintiff or his or her decedent suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and/or as described in the *Iran Short Form Complaint*, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged in Appendix 1.
- f. The name, relationship to the injured and/or deceased September 11 victim, residency, citizenship/nationality, and the general nature of the claim for each plaintiff asserting wrongful death and/or personal injury claims is listed on the attached Appendix 1, and is incorporated herein as allegations, with all allegations of the related complaints, as specified above, deemed alleged as to each plaintiff.

IDENTIFICATION OF THE DEFENDANT

- 7. The only Defendant named in this *Short Form Complaint* is the Islamic Republic of Iran.

NO WAIVER OF OTHER CLAIMS

- 8. By filing this *Short Form Complaint*, Plaintiffs are not waiving any right to file suit against any other potential defendants or parties.
- 9. By filing this *Iran Short Form Complaint*, Plaintiffs are not opting out of any class that the Court may certify in the future.

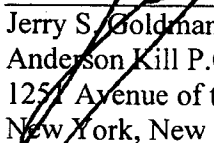
WHEREFORE, Plaintiffs pray for relief and judgment against Defendant as set forth in the *Burnett* Iran Complaint, as indicated above.

JURY DEMAND

Plaintiffs hereby demand a trial by jury as to the claims in this action.

Dated: June 12, 2018

Respectfully submitted,



Jerry S. Goldman
Anderson Kill P.C.
1251 Avenue of the Americas
New York, New York
Telephone: 212-278-1000
jgoldman@andersonkill.com
Attorneys for Plaintiffs

See Appendix 1 Annexed

APPENDIX 1 TO THE IRAN SHORT FORM COMPLAINT

Each line below is deemed an allegation, incorporating the allegations, language and references within the *Burnett* Amended Complaint as noted in the Iran Short Form Complaint to which this Appendix is appended. All allegations below shall be referenced as Allegation 1 of Appendix 1 to Iran Short Form Complaint, Allegation 2 of Appendix 1 to the Iran Short Form Complaint, etc.

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
1	Agyeman, Roberta	NY	Addo, Sophia	Daughter	Ghana	Ghana	Solatium
2	Ameyaw, Joseph	NY	Addo, Sophia	Spouse	Ghana	Ghana	Solatium
3	Ahern, Edward	FL	Ahearn, (Lt.) Brian G.	Father	United States	United States	Solatium
4	Ahern, June	FL	Ahearn, (Lt.) Brian G.	Mother	United States	United States	Solatium
5	Mosobbir, Abdul	NY	Ahmed, Shabbir	Brother/PR	United States	United States	Solatium/ Wrongful Death
6	Frederick, Lafayette	NC	Aldridge, Jacquelyn D.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
7	Allen, Denise	NY	Allen, Richard L.	Mother/PR	United States	United States	Solatium/ Wrongful Death
8	Alonso, Robert	NY	Alonso, Janet	Spouse/PR	United States	United States	Solatium/ Wrongful Death
9	Javier, Giovanni	NY	Alvarez, Javier A.	Son	United States	United States	Solatium
10	Barragan, Filiberta	NY	Alvarez, Javier A.	Spouse	Mexico	United States	Solatium
11	Amatuccio, Debra	NY	Amatuccio, Joseph	Spouse/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
12	Amundson, Ryan	MO	Amundson, (Spc.) Craig	Brother	United States	United States	Solatium
13	Amundson, Orland	MO	Amundson, (Spc.) Craig	Father	United States	United States	Solatium
14	Amundson, Karen	MO	Amundson, (Spc.) Craig	Mother	United States	United States	Solatium
15	Asaro, Helouiza	NY	Asaro, Carl	Spouse/PR	Brazilian	United States	Solatium/ Wrongful Death
16	Audiffred, Robin	NY	Audiffred, James	Spouse/PR	United States	United States	Solatium/ Wrongful Death
17	Ayala, Samantha	KY	Ayala, Samuel (Sandy)	Daughter/PR	United States	United States	Solatium/ Wrongful Death
18	Pettignano, Evelyn	NJ	Babakitis, Arlene T.	Sister	United States	United States	Solatium
19	Reoch, Sadie	NY	Babakitis, Arlene T.	Mother	United States	United States	Solatium
20	Reoch- Moriarty, Karen	NY	Babakitis, Arlene T.	Sister	United States	United States	Solatium
21	Baierwalter, Laura	NY	Baierwalter, Robert J.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
22	Barnes-Ford, Susan	NY	Barnes, Matthew	Spouse/PR	United States	United States	Solatium/ Wrongful Death
23	Barnes, Ricardo	NY	Barnes, Shelia P.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
24	Linker, Elizabeth	NY	Biggart, William G.	Sister	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
25	Biggart, William J.	NY	Biggart, William G.	Father	United States	United States	Solatium
26	Biggart, Margaret	NY	Biggart, William G.	Sister	United States	United States	Solatium
27	Bishop, William	NJ	Bishop, George	Son	United States	United States	Solatium
28	Smith, Kevin	TX	Blagburn, Carrie R.	Son	United States	United States	Solatium
29	Williams, Kim	MD	Blagburn, Carrie R.	Daughter	United States	United States	Solatium
30	Boccardi, Carol	NY	Boccardi, Michael A.	Mother/PR	United States	United States	Solatium/ Wrongful Death
31	Boccardi, Michael	NY	Boccardi, Michael A.	Father/PR	United States	United States	Solatium/ Wrongful Death
32	Bowen, Eugene	FL	Bowen, Donna	Spouse/PR	United States	United States	Solatium/ Wrongful Death
33	Tillman, Carrie	NY	Bowers, Veronique N.	PR	United States	United States	Wrongful Death
34	Hornback, Michele L.	IN	Bright, Gary L.	Sister	United States	United States	Solatium
35	Bright, Jeffery M.	TN	Bright, Gary L.	Brother	United States	United States	Solatium
36	Caballero, Maria	TX	Caballero, Daniel M.	Mother/PR	United States	United States	Solatium/ Wrongful Death
37	Cachia, Joseph	FL	Cachia, Brian	Father/PR	United States	United States	Solatium/ Wrongful Death
38	Calabro, Francine	NJ	Calabro, Salvatore B.	Spouse	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
39	Calabro, Alexander	NJ	Calabro, Salvatore B.	Son	United States	United States	Solatium
40	Calabro, Daniel	NJ	Calabro, Salvatore B.	Son	United States	United States	Solatium
41	Calabro, Carl	NY	Calabro, Salvatore B.	Brother	United States	United States	Solatium
42	Calixte- Williams, Marguerite	CO	Calixte, Felix	Mother/PR	United States	United States	Solatium/ Wrongful Death
43	Camaj, Vincent	NY	Camaj, Roko	Son	United States	United States	Solatium
44	Ortiz, Crystal	NY	Carlson, Rosemarie C.	Daughter	United States	United States	Solatium
45	Ortiz, Evita	FL	Carlson, Rosemarie C.	Daughter	United States	United States	Solatium
46	Carson, Debra	NY	Carson, James Jr.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
47	Cash, Angenette	MD	Carter, Angelene C.	Daughter	United States	United States	Solatium
48	Carter-Perry, Freddie	MD	Carter, Angelene C.	Daughter	United States	United States	Solatium
49	Casaldue, Paul	FL	Casaldue, Vivian	Son	United States	United States	Solatium
50	Cascio, Evan	CA	Cascio, Paul R.	Brother	United States	United States	Solatium
51	Cascio, Paul	NY	Cascio, Paul R.	Father	United States	United States	Solatium
52	Cascio, Janet	NY	Cascio, Paul R.	Mother	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
53	Rodriguez, Claudia	NJ	Castano, Alejandro	Sister	United States	United States	Solatium
54	Castano, Yolanda	NJ	Castano, Alejandro	Mother	United States	United States	Solatium
55	Castano, Francisco	Columbia	Castano, Alejandro	Father	United States	United States	Solatium
56	Castano, Steven	NC	Castano, Alejandro	Son	United States	United States	Solatium
57	Roman, Silvio	NJ	Castillo, Arcelia	Son	United States	United States	Solatium
58	Chada, Virgina	VA	Chada, John	Spouse/PR	United States	United States	Solatium/ Wrongful Death
59	Cherry- Daniel, Selena	VA	Cherry, Vernon P.	Daughter/PR	United States	United States	Solatium/ Wrongful Death
60	Soria, Ana	NY	Chimbo, Luis A.	Spouse	Ecuador	Ecuador	Solatium
61	Chimbo, Luis	NY	Chimbo, Luis A.	Son	Ecuador	Ecuador	Solatium
62	Chowdhury, Fahina	Ok	Chowdhury, Mohammed S.	Daughter	United States	United States	Solatium
63	Chowdhury, Farqad	OK	Chowdhury, Mohammed S.	Son	United States	United States	Solatium
64	Ashrafi, Baraheen	OK	Chowdhury, Mohammed S.	Spouse	United States	United States	Solatium
65	Cintron- Lugos, William	FL	Cintron, Edna	Spouse	United States	United States	Solatium
66	Clark, LaShawn	PA	Clark, Benjamin K.	Spouse/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
67	Sampson, Stephanie Marie Clarke	NY	Clarke, Donna	Daughter/PR	United States	United States	Solatium/ Wrongful Death
68	Cloud, Mio	CT	Cloud, Geoffrey	Spouse/PR	United States	United States	Solatium/ Wrongful Death
69	Natiello-Schotte, Beth	PA	Cody, Patricia A.	Daughter	United States	United States	Solatium
70	Cohen-Day, Joyce	FL	Cohen, Florence	Daughter/PR	United States	United States	Solatium/ Wrongful Death
71	Colon, Orquidia	NY	Concepcion, Jamie	Daughter	United States	Dominican Republic	Solatium
72	Colon, Rosa	NY	Concepcion, Jamie	Daughter	United States	Dominican Republic	Solatium
73	Colon, Reginald	NY	Concepcion, Jamie	Son	United States	Dominican Republic	Solatium
74	Colon-Concepcion, Juana	NY	Concepcion, Jamie	Spouse	United States	Dominican Republic	Solatium
75	Concepcion, Jamie	NY	Concepcion, Jamie	Son	United States	Dominican Republic	Solatium
76	Taylor, Dorothy M.	NY	Conley, Denease	Domestic Partner	United States	United States	Solatium
77	Conway, Russell	NY	Conway, Brenda E.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
78	Garcia, Keidy	LA	Cook, Helen	Sister	Honduras	Honduras	Solatium
79	Garcia, Teoflia	NY	Cook, Helen	Mother	Honduras	Honduras	Solatium
80	Garcia, Blanca M.	NY	Cook, Helen	Sister	Honduras	Honduras	Solatium
81	Garcia,	FL	Cook, Helen	Brother	Honduras	Honduras	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
	Edson						
82	Cordero, Moises	NY	Cordero, Alejandro	Father/PR	United States	United States	Solatium/ Wrongful Death
83	Buck, Laura	HI	Corrigan, Georgine R.	Daughter/PR	United States	United States	Solatium/ Wrongful Death
84	Costanza, John	NY	Costanza, Digna	Spouse/PR	United States	United States	Solatium/ Wrongful Death
85	Coyle, James	NY	Coyle, James R.	Father/PR	United States	United States	Solatium/ Wrongful Death
86	Cross, Charles	NY	Cross, Dennis	Brother	United States	United States	Solatium
87	Fredriksen, Virginia	NY	Cross, Dennis	Sister	United States	United States	Solatium
88	Cubas, Carol	ME	Cubas, Kenneth J.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
89	Sulfika, Erika	NY	Curtin, Michael	Daughter	United States	United States	Solatium
90	Curtin, Helga	NY	Curtin, Michael	Spouse	United States	United States	Solatium
91	Davidson, Daniel	NY	Davidson, Lawrence	PR	United States	United States	Wrongful Death
92	Davidson, William	Canada	Davidson, Titus	Brother/PR	Canada	Jamaica	Solatium/ Wrongful Death
93	Debek, Paige	NY	Debek, Tara	Daughter	United States	United States	Solatium
94	Moore, Robert	NY	Debek, Tara	Brother	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
95	Moore, Maureen	NY	Debek, Tara	Mother	United States	United States	Solatium
96	Reahl, Lisa	NY	Debek, Tara	Sister	United States	United States	Solatium
97	DeConto, David	MA	DeConto, Gerald F.	Brother/PR	United States	United States	Solatium/ Wrongful Death

28 USC 1608 Summons IH 6

4/17

UNITED STATES DISTRICT COURT
for the
Southern District of New York

ROBERTA AGYEMAN, ET AL. (see
appendix)

Plaintiff

v.

ISLAMIC REPUBLIC OF IRAN

Defendant

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)
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Civil Action No. _____

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ISLAMIC REPUBLIC OF IRAN,
c/o Permanent Mission of Iran
to the United Nations
622 Third Avenue
New York, NY 10017

A lawsuit has been filed against you.

Within 60 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jerry S. Goldman, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas
New York, NY 10020
(212) 278-1000
jgoldman@andersonkill.com

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

28 USC 1608 Summons (12/11) (Page 2)

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

▸ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

▸ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

▸ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

▸ I returned the summons unexecuted because _____; or

▸ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

APPENDIX

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
1	Agyeman, Roberta	NY	Addo, Sophia	Daughter	Ghana	Ghana	Solatium
2	Ameyaw, Joseph	NY	Addo, Sophia	Spouse	Ghana	Ghana	Solatium
3	Ahern, Edward	FL	Ahearn, (Lt.) Brian G.	Father	United States	United States	Solatium
4	Ahern, June	FL	Ahearn, (Lt.) Brian G.	Mother	United States	United States	Solatium
5	Mosobbir, Abdul	NY	Ahmed, Shabbir	Brother/PR	United States	United States	Solatium/ Wrongful Death
6	Frederick, Lafayette	NC	Aldridge, Jacquelyn D.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
7	Allen, Denise	NY	Allen, Richard L.	Mother/PR	United States	United States	Solatium/ Wrongful Death
8	Alonso, Robert	NY	Alonso, Janet	Spouse/PR	United States	United States	Solatium/ Wrongful Death
9	Javier, Giovanni	NY	Alvarez, Javier A.	Son	United States	United States	Solatium
10	Barragan, Filiberta	NY	Alvarez, Javier A.	Spouse	Mexico	United States	Solatium
11	Amatuccio, Debra	NY	Amatuccio, Joseph	Spouse/PR	United States	United States	Solatium/ Wrongful Death
12	Amundson, Ryan	MO	Amundson, (Sp.) Craig	Brother	United States	United States	Solatium
13	Amundson, Orland	MO	Amundson, (Sp.) Craig	Father	United States	United States	Solatium
14	Amundson, Karen	MO	Amundson, (Sp.) Craig	Mother	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
15	Asaro, Helouiza	NY	Asaro, Carl	Spouse/PR	Brazilian	United States	Solatium/ Wrongful Death
16	Audiffred, Robin	NY	Audiffred, James	Spouse/PR	United States	United States	Solatium/ Wrongful Death
17	Ayala, Samantha	KY	Ayala, Samuel (Sandy)	Daughter/PR	United States	United States	Solatium/ Wrongful Death
18	Pettignano, Evelyn	NJ	Babakitis, Arlene T.	Sister	United States	United States	Solatium
19	Reoch, Sadie	NY	Babakitis, Arlene T.	Mother	United States	United States	Solatium
20	Reoch- Moriarty, Karen	NY	Babakitis, Arlene T.	Sister	United States	United States	Solatium
21	Baierwalter, Laura	NY	Baierwalter, Robert J.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
22	Barnes-Ford, Susan	NY	Barnes, Matthew	Spouse/PR	United States	United States	Solatium/ Wrongful Death
23	Barnes, Ricardo	NY	Barnes, Shelia P.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
24	Linker, Elizabeth	NY	Biggart, William G.	Sister	United States	United States	Solatium
25	Biggart, William J.	NY	Biggart, William G.	Father	United States	United States	Solatium
26	Biggart, Margaret	NY	Biggart, William G.	Sister	United States	United States	Solatium
27	Bishop, William	NJ	Bishop, George	Son	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
28	Smith, Kevin	TX	Blagburn, Carrie R.	Son	United States	United States	Solatium
29	Williams, Kim	MD	Blagburn, Carrie R.	Daughter	United States	United States	Solatium
30	Boccardi, Carol	NY	Boccardi, Michael A.	Mother/PR	United States	United States	Solatium/ Wrongful Death
31	Boccardi, Michael	NY	Boccardi, Michael A.	Father/PR	United States	United States	Solatium/ Wrongful Death
32	Bowen, Eugene	FL	Bowen, Donna	Spouse/PR	United States	United States	Solatium/ Wrongful Death
33	Tillman, Carrie	NY	Bowers, Veronique N.	PR	United States	United States	Wrongful Death
34	Hornback, Michele L.	IN	Bright, Gary L.	Sister	United States	United States	Solatium
35	Bright, Jeffery M.	TN	Bright, Gary L.	Brother	United States	United States	Solatium
36	Caballero, Maria	TX	Caballero, Daniel M.	Mother/PR	United States	United States	Solatium/ Wrongful Death
37	Cachia, Joseph	FL	Cachia, Brian	Father/PR	United States	United States	Solatium/ Wrongful Death
38	Calabro, Francine	NJ	Calabro, Salvatore B.	Spouse	United States	United States	Solatium
39	Calabro, Alexander	NJ	Calabro, Salvatore B.	Son	United States	United States	Solatium
40	Calabro, Daniel	NJ	Calabro, Salvatore B.	Son	United States	United States	Solatium
41	Calabro, Carl	NY	Calabro, Salvatore B.	Brother	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
42	Calixte-Williams, Marguerite	CO	Calixte, Felix	Mother/PR	United States	United States	Solatium/ Wrongful Death
43	Camaj, Vincent	NY	Camaj, Roko	Son	United States	United States	Solatium
44	Ortiz, Crystal	NY	Carlson, Rosemarie C.	Daughter	United States	United States	Solatium
45	Ortiz, Evita	FL	Carlson, Rosemarie C.	Daughter	United States	United States	Solatium
46	Carson, Debra	NY	Carson, James Jr.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
47	Cash, Angenette	MD	Carter, Angelene C.	Daughter	United States	United States	Solatium
48	Carter-Perry, Freddie	MD	Carter, Angelene C.	Daughter	United States	United States	Solatium
49	Casaldue, Paul	FL	Casaldue, Vivian	Son	United States	United States	Solatium
50	Cascio, Evan	CA	Cascio, Paul R.	Brother	United States	United States	Solatium
51	Cascio, Paul	NY	Cascio, Paul R.	Father	United States	United States	Solatium
52	Cascio, Janet	NY	Cascio, Paul R.	Mother	United States	United States	Solatium
53	Rodriguez, Claudia	NJ	Castano, Alejandro	Sister	United States	United States	Solatium
54	Castano, Yolanda	NJ	Castano, Alejandro	Mother	United States	United States	Solatium
55	Castano, Francisco	Columbia	Castano, Alejandro	Father	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
56	Castano, Steven	NC	Castano, Alejandro	Son	United States	United States	Solatium
57	Roman, Silvio	NJ	Castillo, Arcelia	Son	United States	United States	Solatium
58	Chada, Virgina	VA	Chada, John	Spouse/PR	United States	United States	Solatium/ Wrongful Death
59	Cherry- Daniel, Selena	VA	Cherry, Vernon P.	Daughter/PR	United States	United States	Solatium/ Wrongful Death
60	Soria, Ana	NY	Chimbo, Luis A.	Spouse	Ecuador	Ecuador	Solatium
61	Chimbo, Luis	NY	Chimbo, Luis A.	Son	Ecuador	Ecuador	Solatium
62	Chowdhury, Fahina	Ok	Chowdhury, Mohammed S.	Daughter	United States	United States	Solatium
63	Chowdhury, Farqad	OK	Chowdhury, Mohammed S.	Son	United States	United States	Solatium
64	Ashrafi, Baraheen	OK	Chowdhury, Mohammed S.	Spouse	United States	United States	Solatium
65	Cintron- Lugos, William	FL	Cintron, Edna	Spouse	United States	United States	Solatium
66	Clark, LaShawn	PA	Clark, Benjamin K.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
67	Sampson, Stephanie Marie Clarke	NY	Clarke, Donna	Daughter/PR	United States	United States	Solatium/ Wrongful Death
68	Cloud, Mio	CT	Cloud, Geoffrey	Spouse/PR	United States	United States	Solatium/ Wrongful Death

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69	Natiello-Schotte, Beth	PA	Cody, Patricia A.	Daughter	United States	United States	Solatium
70	Cohen-Day, Joyce	FL	Cohen, Florence	Daughter/PR	United States	United States	Solatium/ Wrongful Death
71	Colon, Orquidia	NY	Concepcion, Jamie	Daughter	United States	Dominican Republic	Solatium
72	Colon, Rosa	NY	Concepcion, Jamie	Daughter	United States	Dominican Republic	Solatium
73	Colon, Reginald	NY	Concepcion, Jamie	Son	United States	Dominican Republic	Solatium
74	Colon-Concepcion, Juana	NY	Concepcion, Jamie	Spouse	United States	Dominican Republic	Solatium
75	Concepcion, Jamie	NY	Concepcion, Jamie	Son	United States	Dominican Republic	Solatium
76	Taylor, Dorothy M.	NY	Conley, Denease	Domestic Partner	United States	United States	Solatium
77	Conway, Russell	NY	Conway, Brenda E.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
78	Garcia, Keidy	LA	Cook, Helen	Sister	Honduras	Honduras	Solatium
79	Garcia, Teoflia	NY	Cook, Helen	Mother	Honduras	Honduras	Solatium
80	Garcia, Blanca M.	NY	Cook, Helen	Sister	Honduras	Honduras	Solatium
81	Garcia, Edson	FL	Cook, Helen	Brother	Honduras	Honduras	Solatium
82	Cordero, Moises	NY	Cordero, Alejandro	Father/PR	United States	United States	Solatium/ Wrongful Death

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83	Buck, Laura	HI	Corrigan, Georgine R.	Daughter/PR	United States	United States	Solatium/ Wrongful Death
84	Costanza, John	NY	Costanza, Digna	Spouse/PR	United States	United States	Solatium/ Wrongful Death
85	Coyle, James	NY	Coyle, James R.	Father/PR	United States	United States	Solatium/ Wrongful Death
86	Cross, Charles	NY	Cross, Dennis	Brother	United States	United States	Solatium
87	Fredriksen, Virginia	NY	Cross, Dennis	Sister	United States	United States	Solatium
88	Cubas, Carol	ME	Cubas, Kenneth J.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
89	Sulfika, Erika	NY	Curtin, Michael	Daughter	United States	United States	Solatium
90	Curtin, Helga	NY	Curtin, Michael	Spouse	United States	United States	Solatium
91	Davidson, Daniel	NY	Davidson, Lawrence	PR	United States	United States	Wrongful Death
92	Davidson, William	Canada	Davidson, Titus	Brother/PR	Canada	Jamaica	Solatium/ Wrongful Death
93	Debek, Paige	NY	Debek, Tara	Daughter	United States	United States	Solatium
94	Moore, Robert	NY	Debek, Tara	Brother	United States	United States	Solatium
95	Moore, Maureen	NY	Debek, Tara	Mother	United States	United States	Solatium
96	Reahl, Lisa	NY	Debek, Tara	Sister	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residence at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
97	DeConto, David	MA	DeConto, Gerald F.	Brother/PR	United States	United States	Solatium/ Wrongful Death

IH-32

Rev: 2014-1

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Roberta Agyeman, et al.

Plaintiff	Case Number
vs.	1:18-cv-05320
Islamic Republic of Iran	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

In re Terrorist Attacks on September 11,
2001

Plaintiff	Case Number
vs.	03 MDL 1570 (GBD)(SN)
Defendant	

IH-32

Rev: 2014-1

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

☒

Open

(If so, set forth procedural status and summarize any court rulings.)

Partial and/or full summary judgment as to Defendant Islamic Republic of Iran has been granted and ordered for select plaintiffs. This matter is still ongoing. On May 25, 2018, the Court entered an Order approving the "Iran Short Form Complaint" that is filed herewith. (See ECF No. 4010 in 1:03-md-01570-GBD-SN).

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This is also a September 11th case for wrongful death that is against the sponsors of terrorism as the Defendant Islamic Republic of Iran is involved in the related MDL action. We are seeking similar relief in the form of damages from the Defendant. The Plaintiffs herein intend to participate in the underlying litigations as to the other defendants in due course. This case is also related to Estate of John Patrick O'Neill Sr., et al. v The Republic of Iraq, et al., 04-1076-GBN-SN; Thomas E. Burnett, Sr., in his own right as the Parent of Thomas E. Burnett, Jr., Deceased, et al. v. The Islamic Republic of Iran, et al., 15-cv-09903-GBN-SN; and Kathleen Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-06977-GBN-FM. The instant complaint is being filed in accordance with the Court's directive of May 25, 2018, ECF No. 4010 in 1:03-md-01570-GBD-SN.

Signature: _____

Jerry S. Goldman, Esq.
Anderson Kji P.C.

Date: June 1, 2018

Firm: _____